

Roger H. Hoole 5089
HOOLE & KING, L.C.
Attorneys for Plaintiffs
4276 South Highland Drive
Salt Lake City, Utah 84124
Telephone: (801) 272-7556
Facsimile: (801) 272-7557
rogerh@hooleking.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

ALICIA ROHBOCK; RUBY JESSOP; SUSAN
BROADBENT; GINA ROHBOCK; NOLAN
BARLOW; JASON BLACK; MAY MUSSER;
HOLLY BISTLINE; LAWRENCE BARLOW;
STEVEN DOCKSTADER; MARVIN COOKE;
HELEN BARLOW; VERGEL BARLOW;
CAROLE JESSOP; BRIELL LIBERTAE
DECKER f/k/a, LYNETTE WARNER; AMY
NIELSON; SARAH ALLRED; THOMAS
JEFFS; and JANETTA JESSOP,

Plaintiff,

vs.

WARREN STEED JEFFS, et al.,

Defendant.

**DAMAGES DECLARATION
OF CAROLE JESSOP**

Case 2:16-cv-00788-TS

Judge G. Ted Stewart

I, Carole Jessop, under criminal penalty under the laws of the State of Utah, and pursuant to Utah Code Ann. § 78B-18a-106, declare as follows:

1. I am over twenty-one years of age.

2. I am a Plaintiff in the above-captioned matter.

3. I make these statements based on my own knowledge and belief.

4. As allowed by the Court, I submit this Damages Declaration to summarize and supplement my trial testimony via Zoom on September 27, 2022.

5. I grew up in the FLDS Church and watched Warren Jeffs become the Prophet. He started to assume leadership in the church years earlier when his father became sick, so when his father died, it was natural for him to succeed to that position. For years after his father passed, Jeffs represented that he was the Prophet through his words and actions. I, along with the other faithful FLDS people, wholeheartedly accepted him as the Prophet, relied on his representations, and strove to obey his every command.

6. During those years, Jeffs withheld from us the pieces of the puzzle we needed to understand the wrong and illegal things he was doing. Jeffs played on my sincere belief in him and deprived me of the critical information I needed to discover his fraud. It was very difficult to eventually understand and accept what he had admitted without my knowledge: that he was a false prophet that had been destroying the people. I believe that destruction continues among the FLDS people because of the limited information they have.

7. Based on my TVPRA and fraud claims against Warren Jeffs, I estimate that I suffered damages as summarized in this Damages Declaration.

8. I was required to work with little or no compensation either for Jeffs' church or the businesses controlled by Jeffs. The work I did included, for example, helping build and line caskets

for babies, assisting in a wood shop with various church requested projects, caring for a graveyard, helping on a farm to provide milk for the Bishop's Storehouse, cooking for bakeries, making meals for work crews, caring for ill or elderly FLDS people, and a lot of sewing projects, including making slips for the women to wear under their FLDS dresses. I also taught second grade full time at a church operated school from August 2004 through May 2005 without pay.

9. I began providing my labor and services when I was 14 and continued providing it until I left the FLDS in October 2013. I had no set hours or hourly rates, except when I was teaching school. I estimate that the work I was not paid for between the ages of 14 and 18 averaged 20 hours a week and that the work I did without compensation after I was 18 on April 3, 2003 until I left the FLDS in October 2013 averaged 16 hours a week.

10. To approximate what I was not paid, for purposes of this Damages Declaration, I will use an average hourly rate of \$7.25. Based on that rate, I estimate my withheld wages as follows:

- a. From age 14 to 18 my wages would have been \$30,160 (20 hours per week x 208 weeks x \$7.25).
- b. From age 18 until October 2013 my wages would have been \$62,756 (16 hours per week x 541 weeks x \$7.25).

11. While I was under Jeffs' control, Jeffs knowingly forced me and threatened me with force to obtain my labor and services. Jeffs also knowingly used physical restraint or the threat of physical restraint of me or my family by keeping me in fear of my family members being split up and sent to repentance houses so that I would provide Jeffs with my labor and services. Jeffs did this knowingly using his fraudulent scheme, plan, and pattern to cause me to believe that if I did not

provide labor and services, I or my loved ones would suffer serious harm and physical restraint.

12. From the time I was 18 and no longer entitled to the necessities of life from my parents, I have had housing provided by the FLDS Church. I have not had my food or other necessities provided by the church because I was never a member of the United Order.

13. The housing was provided at a basic level in a communal setting akin to the standard of living likely experienced by other victims of labor trafficking or similar fraud who are required to live with large numbers of people.

14. The value of those necessities should be set off against the higher hourly rates that I should have been paid for my forced labor and services.

15. Nevertheless, I estimate the value of those very basic necessities at \$300 a month. Based on that valuation over the 126 months from my 18th birthday on through when I left to be \$37,800. That total may, at the Court's discretion, be deducted from my economic damages.

16. Accordingly, my personal withheld wage claim amounts to \$55,116 ($\$30,160 + \$62,756 - \$37,800$). I also sustained further economic damages because Jeffs cut off the income that supported me and my children.

17. As noted at trial and in their respective Damages Declarations, my husband, Vergel Barlow, and my sister wife, Helen Barlow, were admitted into the United Order. This required them to give 100% of their income to Jeffs in exchange for which they were entitled to food and other necessities from the Bishop's storehouse.

18. I was not allowed into the United Order and not only lost my family income but had no access to the storehouse for necessities. Later when Vergel and Helen lost favor with Jeffs and

lost their church-controlled jobs, they too had no means of support and no access to the storehouse. As we all testified, this put our family into a terrible financial state.

19. At the time this was happening, I was unable to work due to medical problems following the birth of my twins. The financial loss to the entire family, including myself was devastating. Accordingly, separate and apart from my personal lost wage damages, I claim additional economic damages in the nominal amount of \$1,000 for a total of at least \$56,116 (\$55,116 + 1,000).

18. Based on the evidence received by the Court in relation to my general or non-economic damages, I ask for an award of general damages in the amount of \$1,000,000.

19. I estimate that my total economic and non-economic damages are at least (\$56,116 + \$1,000,000) for a total of \$1,056,116.

20. Finally, I request an award of punitive damages in an amount of equal to my total economic and non-economic damages.

I declare under criminal penalty of perjury in the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.



Carole Jessop